

REMARKS/ARGUMENTS

Claims 17-23, 25-28, 30-34, 36-38, and 41-48 stand rejected under 35 U.S.C. 103(a) as being unpatentable over United States Patent No. 6,240,411 to Thearling (“Thearling”) in view of United States Patent Application Publication No. 2002/0174182 by Wilkinson, et al. (“Wilkinson”) and further in view of United States Patent No. 6,697,088 to Hollander (“Hollander”). In addition, Claim 39 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Thearling in view of Wilkinson and further in view of United States Patent No. 6,236,978 to Tuzhilin (“Tuzhilin”). Furthermore, Claim 40 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Thearling in view of Wilkinson and further in view of Hollander and further in view of United States Patent Application Publication No. 2001/0037346 by Johnson (“Johnson”).

The Applicant notes that the Hollander reference is a new reference not cited by the Examiner in the first, second, or third Office Actions.

The Applicant believes that previously presented Claims 17 and 37 are patentable over Thearling, Wilkinson, and Hollander as these reference do not teach or suggest the subject matter of Claims 17 and 37. In addition, the Applicant believes that Claims 18-23, 25-28, 30-34, and 36, being dependent on Claim 17, and adding patentable features thereto, are also patentable. Furthermore, the Applicant believes that Claims 38-48, being dependent on Claim 37, and adding patentable features thereto, are also patentable. Accordingly, the Examiner is respectfully requested to reconsider the previously presented claims in the above listing of claims in view of the following comments.

For reference, previously presented Claim 17 recites the following:

17. (Previously Presented) A data mining system for delivering presentations associated with data mining models, said data mining system comprising:

a repository to store said data mining models, customer attributes, and presentation definitions;

means to edit said data mining models, said presentation definitions, and said customer attributes;

means to generate a presentation to deliver to a customer system; wherein said means to generate includes an analytic decision engine system including model presentation services and scoring services modules; and,

means to receive inputs from said customer system and to deliver said presentation to said customer system;

wherein said inputs include a customer identification and a presentation definition identification;

wherein said means to generate selects a presentation definition using said presentation definition identification and selects a customer attribute using said customer identification;

wherein said presentation definition includes a reference to a data mining model and one or more rules;

and,

wherein said means to generate applies said data mining model and said one or more rules to said customer attribute to produce an outcome for display in said presentation according to a format included in said presentation definition.

On pages 3-6 of the Office Action, the Examiner cites Thearling, Wilkinson, and Hollander against Claim 17.

For reference, the selections from Thearling cited by the Examiner against Claim 17 are as follows (context and underlining added):

“FIG. 2 illustrates an example of application of a model to a database 20. The model 26 is fed to a model engine 22. For example, the model 26 may be an executable file that can be applied by the model engine 22. The model engine 22 takes as an input a database 20. The database 20 may be a database such as that shown at 15, but including only columns 17a-17c...The model engine 22 may then apply the model to each record in the database 20 to produce a modified database 24. This modified database 24 would include the results of application of the model 26 to the database 20. Thus, the modified database 24 could be a table that includes an extra field (or column) that specifies the results of application of the model (or a separate table storing a key and a score, which can be joined with other tables). For example, in table 33 of FIG. 3, application of the model 26 could have resulted in a score, which is added to the table 33 in the last column 32d. Each record (e.g. 31b-31e) receives a corresponding calculated model value (e.g. rows 31b-31e in column 32d).” (Col. 2, lines 47-65.)

“FIG. 5 illustrates one graphical interface for constructing a query. This interface is available in the VALEX.upsilon.program sold by Exchange Applications of Boston, Mass...The screen 50 may be displayed on the screen of a general personal computer, or any other computer. The screen may include a set of fields 51, such as available in conventional software programs. For example, there may be a file field, an edit field, a view field, an options field, a tools field and a help field...Some or all of the possible commands that can be entered may also have push button interfaces 52. Thus, a new document could be opened or the existing query saved by pressing an applicable button on the tool bar 52.” (Col. 4, line 63 to col. 5, line 8.)

“FIG. 7 illustrates one embodiment of a system for performing the method illustrated in FIG. 6. In this embodiment, a data mining system 70 generates a model 72. This generation of models may be done as described above, including with reference to FIG. 1. As described above, the data mining engine can be a software program or package executed on a general purpose or personal computer...The model 72 is passed to a campaign manager 76. This may be implemented using a simple software interface, allowing the user to select a model (through a model reference) and build a model record 74, as described below. OLE or other

mechanisms can be used to automate building the model library 78. The campaign manager 76 may be a separate software module resident on the same computer as the data mining system 70...The campaign manager 76 may then retain the model in a model library 78. The model library 78 may be a database or data structure storing the models available to the campaign manager. In one embodiment, the models may be stored as data records, e.g., record 74. Such a record could include a variety of fields. For example, a name field 75a could store a value corresponding to a name of the model (here, 'X'). A comment field 75b could be included. Thus, the creator of the model (or any other person) could add comments about the model, for example comments about the meaning of scores for the model. Thus, if a model generates scores in a range from zero to one, the creator of the model might indicate that scores above 0.8 indicate a high likelihood that a customer will provide repeat business. A creator field 75c might record information about the creator or the software (e.g. data mining system 70) that was used to create the model. Similarly, a date field 75d might record the date the model was created. Other fields may be useful, such as a field in the data record 74 specifying which characteristics of the database (i.e., which fields within a record) are used by the model to generate a score...A model field 75e may also be included. This field may provide a mechanism for the campaign manager 76 to use the model to score a record in a database table. This field may include executable code. The executable code could be executed, for example, by the campaign manager 76 or passed by the campaign manager 76 to the data mining engine 74 for evaluation by the data mining system 70. The model field 75e might, in the alternative, provide a pointer to a separate area of storage within the model library 78, or to storage associated with the data mining system 70, that includes information necessary to use the model to score database records. That information might be an executable file or parameters for use in conjunction with an executable file that informs the model how to evaluate the score (such as coefficients for an equation).” (Col. 9, line 23 to col. 10, line 7.)

“FIG. 8 illustrates a tool that may be used for allowing a user to specify a model for use in building a query. In one embodiment, inputting of models for the queries can be done in a manner similar to the way that fields are specified for a table--the only difference being that a reference to a model is made rather than just the field...The tool illustrated in FIG. 8 also

includes a value field 86. The value field would permit a user to input the appropriate value for comparison with the model score...Of course many other features could be incorporated into the interface. As one example, a field could be added that shows the current portion of the query being constructed (e.g., model 'X' greater than 0.8). Similarly, interface buttons may be included that allow a user to check the syntax of the current query (for example, if the user inputs an incorrect value in the value portion of the screen 86, such as inputting a character string when the output of the model is a numerical score.) Other features could be implemented, for example, viewing (or editing) of a model could be permitted...In one embodiment of the present invention, the model is run against the database not only as a part of the campaign management process, but also the campaign management process is used to restrict the number of records that are evaluated by the model. (In some embodiments, the user may be permitted to (a) specify whether all models are run against the entire database, (b) specify that only identified models are run against restricted databases or (c) specify that all models should be run against restricted databases.)” (Col. 10, line 21 to col. 11, line 22.)

For reference, the selections from Wilkinson cited by the Examiner against Claim 17 are as follows (underlining added):

“[0009] The present invention is a system and method that facilitates expedient and efficient presentation of information in a manner that increases the probability of target individual interaction. The present invention system and method is able to monitor user interactions, optimize interaction motivation plans and test interaction motivation plans. In one embodiment of the present invention, a real time electronic service interaction management system and method is utilized to assist development and implementation of electronic commerce (e-commerce) campaign activities. For example, the present invention is utilized to assist electronic marketing optimization (e-MO) by automated management of promotional campaigns in conjunction with an e-commerce site. A present invention real time electronic service interaction management system and method monitors the interactions (e.g., purchasing behavior) of target individuals (e.g., customers) and has the ability to assist development of an interaction motivation plan. An interaction motivation test plan sets

guidelines and rules for information presentation to a target audience. The present invention system and method also has the ability to develop interaction motivation test plans for learning about target individual interaction activities and accordingly modify interaction motivation plans (e.g., change decision rules) in both real time and over the lifetime of a campaign.”

“[0025] In one embodiment of the present invention, an interaction motivation plan includes multiple constituent interaction motivation plans. In one exemplary implementation, the overall interaction motivation plan selects a constituent interaction motivation plan in accordance with rules or guidelines similar to selection of an action above. For example, a constituent interaction motivation plan needs to be activated to further select the action to be presented to a target. This hierarchy of motivation plans permits multiple interaction motivation plans to be considered when it is not clear which one is ‘best’ (e.g., facilitates maximized achievement of campaign objectives within campaign restrictions). The multiple interaction plans are tested and optimized similar to testing and optimization of individual actions.”

“[0032] The component modules of real time electronic service interaction management system **100** cooperatively operate to facilitate development of an interaction motivation plan and creation of information presentation instructions in accordance with the interaction motivation plan. Database module 110 receives and stores information associated with target interaction (e.g., information about customers such as descriptive and behavioral characteristics and their interactions with real time electronic service interaction management system 100), relevant system state and external state information, as well as information associated with the state of a touch-point (a point of interaction with the system). Data mining module 120 analyzes information utilized to predict and describe target interaction behavior (e.g., through techniques such as segmentation, clustering, affinity analysis, etc.). Testing module **130** creates an interaction motivation test plan. In one exemplary implementation, the interaction motivation test plan is directed at automatically learning about target (e.g., customer) interactions based upon a particular touch-point state (e.g. with particular information presentations). The interaction motivation test plan is also directed at

testing (e.g., validating and enhancing) the analysis of information by data mining module **120**. Optimization module **140** creates optimizing inputs to an interaction motivation plan. In one exemplary implementation of the present invention, the optimizing inputs are directed to increasing user interactions with respect to the specified objectives (e.g., from a system manager) while meeting predetermined constraints (e.g., also specified by the system manager). Plan merging module **150** combines the test inputs and optimization inputs into one interaction motivation plan. Target (e.g., customer) interaction module **170** provides instructions to a ‘touch point’ (e.g., website, call center, email, phone system, a graphical user interface, etc.) for presenting information in accordance with an interaction motivation plan. In one embodiment of the present invention, target interaction module **170** also records customer responses and behavior. Management interface module **190** facilitates communication of information to and from campaign sponsors (e.g., campaign managers).”

“**[0036]** In one exemplary implementation of the present invention, information is processed through real time electronic service interaction management system **100** and an interaction motivation plan is developed. Referring still to FIG. 1, relevant historical data ‘A’ (e.g., customer profiles, customer transactions, product information, information on previous interactions, information on promotions, etc.) is transferred to mining module **120**. The data mining results ‘B’ are fed into testing module **130** (e.g., quantitative data describing customer behavior, candidate interactions, segmentation, etc.). In one exemplary implementation, real time target interaction data ‘C’ (e.g., current customer activity) is also sent to testing module **130**. Interaction motivation test plans ‘D1’ and behavior model ‘D2’ are transferred to optimization module **140**. Optimization module **140** provides feedback ‘E’ to testing module **130** on which parameters require further testing to increase confidence in an optimized solution (e.g., an optimized interaction motivation plan). Inputs ‘F’ from testing module **130** (e.g., an interaction motivation test plan) and optimization module **140** (e.g., an optimized interaction motivation plan) are transferred to merging module **150** and merged into an interaction motivation plan. The merged interaction motivation plan ‘G’ is transferred to interaction module **170** which creates information presentation instructions in accordance with the merged interaction motivation plan. Information associated with target (e.g., customer) interaction ‘H’ is recorded in a real time response database **115** and archived into

historical database **117**. In one exemplary implementation of the present invention, system management module **190** operates as an interface that facilitates communication of information ‘I’ ‘J’ and ‘K’ (e.g., campaign objectives and constraints) to and from a manager.”

“**[0037]** In one embodiment of the present invention, customer interaction module **170** receives target interaction information and provides presentation information and instructions in accordance with an interaction motivation plan. In one embodiment of the present invention, customer interaction module **170** includes a graphical user interface that displays stimulation information in accordance with an interaction motivation plan (e.g., a product or service offer plan). In one embodiment of the present invention, customer interaction module **170** also records which stimulation action (e.g., offer action) was made and customer response actions including the customer identification and system state when the response action occurred. In one exemplary implementation of the present invention, customer interaction module **170** records customer actions and states that, although not relevant to the current interaction motivation plan (e.g., offer plan), are a part of the customer behavior model.”

“**[0039]** In one embodiment of the present invention, the target interaction module presents information (e.g., an offer or promotional material) to a target according to the procedure defined by the interaction motivation plan. In one exemplary implementation of the present invention, an interaction motivation plan includes a set of instructions that are interpreted and utilized by target interaction module **170** to develop a stimulation action (e.g., an information presentation).”

“**[0045]** The components of computer system **200** cooperatively function to provide a variety of functions, including alignment directions. Address/data bus **210** communicates information, central processor **201** processes information and instructions, volatile memory **202** (e.g., random access memory RAM) stores information and instructions for the central processor **201** and non-volatile memory **203** (e.g., read only memory ROM) stores static information and instructions. Optional removable data storage device **204** (e.g., CD) also

stores information and instructions. Display module **205** displays information to the computer user. Alphanumeric input device **206** and cursor directing device **207** communicate user input information and command selections to the central processor **201**. Signal Communication port **208** is a communication interface (e.g., a serial communications port) for communicating signals to and from coupled peripheral devices.”

Also, please consider the following additional selections from Wilkinson (underlining added):

“**[0021]** The present invention facilitates development of an interaction motivation plan designed to evoke and stimulate target interaction. In one embodiment of the present invention, a real time electronic service interaction management system and method is utilized to aid development of electronic commerce (e-commerce) presentations that are provided to a target (e.g., a customer). For example, the present invention is utilized to assist electronic marketing optimization (e-MO) by automated management of promotional campaigns associated with an e-commerce site. The interaction motivation plan sets guidelines or rules that determine the presentation of information to a target individual (e.g., a customer) as part of an interaction campaign (e.g., an e-commerce marketing campaign). In one embodiment of the present invention, the interaction motivation plan includes guidelines for presenting information in accordance with customer segmentation definitions, promotion definitions, campaign objectives and campaign constraints. A present invention real time electronic service interaction management system and method monitors the interactions (e.g., purchasing behavior) of targets (e.g., customers) and has the ability to continually modify interaction motivation plans (e.g., change information presentation rules and guidelines) in both real time and over the lifetime of an interaction motivation campaign.”

“**[0022]** Information is presented to a target and the target is permitted to interact with the system. The target is an external object and has an associated set of target attributes or characteristics that include demographic characteristics that describe the target (e.g., age, income, etc.) and behavioral attributes (e.g., number of purchases from a company within a specific time period, click through events to links within a web site, recency and frequency

of visits to a store or website, etc.). In one embodiment of the present invention a target has an associated subset of attributes or characteristics that uniquely identify the target (e.g., social security number, identification number, etc.). The present invention is readily adaptable to accommodate interactions from a variety of targets (e.g., a person, an audience, an organization, a business, another system, an electronic device, etc.). In one exemplary implementation of the present invention, a target is a customer accessing information from the system through a touch-point (e.g., an e-commerce site)."

"[0023] In one embodiment of the present invention, information presented to a target is part of a stimulation action. A stimulation action presents information intended to motivate the target to interact with the system. Each stimulation action has an associated set of stimulation attributes or characteristics (e.g., a specific monetary discount amount, a percentage reduction, a formal or informal presentation style, etc.). In one embodiment of the present invention, a stimulation action has an associated subset of attributes or characteristics that uniquely identify the stimulation action. In one exemplary e-commerce implementation of the present invention a stimulation action includes an offer action (e.g., an offer or advertisement to purchase a good or service at a particular price)."

"[0024] The present invention system and methods utilize an interaction motivation plan to determine what stimulation action if any is presented to a target and when to present it. In one exemplary implementation a motivation interaction plan is a procedure utilized to figure out for given system characteristics what stimulation action to present to a target with certain attributes. In one exemplary implementation, an interaction motivation plan is represented by logical rules based on customer and system attributes, by probability distributions of actions to be performed on certain kinds of customers, or by a process of conditional instructions. An exemplary customer and system attribute rule includes if a customer is younger than 30 and the total number of performances of actions is less than 20 then perform a first action. An exemplary based upon probability distributions of actions to be performed on certain kinds of customers includes for all customers younger than 50 present 20% with a first action and 80% with a second action. An exemplary process of conditional instruction rule includes if a customer older than 20 then present a first action and if it triggers a desired interaction

then present a second action (e.g., the second action is possibly presented immediately after the first action in real time), if not then present a third action. In one embodiment of the present invention, the interaction motivation plan includes interaction (e.g., present offer x until condition y).”

For reference, the selections from Hollander cited by the Examiner against Claim 17 are as follows (context and underlining added):

“Upon receipt of the message 42, the presentation manager 22 provides the appropriate presentation definition and the corresponding data to a client 24 or 26. The presentation manager 22 retrieves the appropriate definition from the databases 28 based on the client type and the screen or window identifier. The client type is generated by a client identifier 44 that determines whether the client is graphic-based or character-based.” (Col. 4, lines 38-45.)

“FIG. 1 also illustrates a development tool 50 that generates the graphic-based and character-based presentation definitions stored in the databases 28. The development tool 50 enables a user to design the layout of the presentation and associate that layout with the data processed by a host application 30. In a trivial example, a parameter such the name of a person may be associated with (and hence displayed in) a specific field in the presentation. As indicated by the dashed lines 52, the development tool 50 loads the databases 28 with the definitions some time before the definitions are retrieved during run-time.” (Col. 4, line 63 to col. 5, line 6.)

Also, please consider the following additional selections from Hollander (underlining added):

“In FIG. 1, a computer system S includes a host processor 20, a run-time presentation manager 22 and several clients 24 and 26. Host applications 30 running on the host processor 20 generate data that is to be displayed by the clients 24 and 26 as part of a graphic-based or character-based presentation. The presentation manager 22 integrates the data from the host applications 30 with graphic-based or character-based definitions that are stored in databases

28 to provide the appropriate presentation information to the clients 24 and 26.” (Col. 3, lines 36-44.)

“A variety of presentation formats may be supported by the presentation layer. Some clients may be computers that support graphic-based presentations. For example, a window-based client displays a presentation using windows containing various icons, text or data fields or other graphical entities. To present the data processed by the application to the user, the data is associated with one or more of the graphical entities in the window... Other clients may be 3270 or 5250 terminals that support character-based presentations. A 3270 or 5250 terminal displays a screen. This screen consists of one or more fields located throughout the screen. In a similar manner as above, these fields are associated with the application data to display the data and/or allow data to be entered into the fields... In the embodiment of FIG. 1, digital representations of these screens and windows are stored in the databases 28. A graphic definition database 28B contains definitions of windows that are displayed by the graphic-based clients 26. A screen definition database 28A contains definitions of 3270 or 5250 screens that are displayed by the character-based clients 24. As discussed below, many other presentation and definition formats may be used in practicing the invention... Referring again to the host applications 30 and the presentation manager 22, the operations involved in supplying the appropriate definitions to the clients 24 and 26 will now be discussed. A host application 30 initiates a presentation by executing a command referred to in FIG. 1 as show presentation 40. In response to the show presentation command 40, a message 42 is sent to the presentation manager 22. This message is part of the presentation manager application program interface (‘API’) that defines the messages that the host processor 20 and the presentation manager 22 use to communicate with one another. The message 42 includes an identifier that identifies a specific screen (e.g., a 3270 screen) or a specific graphical display (e.g., a window) associated with a particular presentation. The message 42 also includes the data associated with the screen or display.” (Col. 3, line 66 to col. 4, line 37.)

“When the client is graphic-based, a graphic-based presentation processor 46 uses the identifier to retrieve a graphic definition from the graphic definition database 28B. The graphic-based presentation processor 46 merges the data from the message 42 with the

definition and sends it to the graphic-based client 26... When the client is character-based, a character-based presentation processor 48 uses the identifier to retrieve a screen definition from the screen definition database 28A. The character-based presentation processor 48 merges the data from the message 42 with the definition and sends it to the character-based client 24.” (Col. 4, lines 46-57.)

“With the above description in mind, FIGS. 3A and 3B describe an exemplary presentation process according to the invention. Beginning at block 200, the process describes operations performed to provide one presentation during a session invoked by a client... At block 206, a host application 30 associated with the session initiates the presentation by executing a show presentation command 40 (e.g., the SHOWWIN 58 or EXFMT 54 commands shown in FIG. 1). In response to this command, an API message 42 is sent to the presentation manager 22. Typically, the API message 42 includes a parameter (e.g., a screen ID) that identifies a particular screen or a parameter (e.g., a window ID) that identifier a particular graphical display along with the data associated with the screen or display.” (Col. 6, line 35 to col. 7, line 4.)

First, Hollander does not teach receiving a presentation definition identification as an input from a customer system as recited in previous Claim 17. On page 6 of the Office Action the Examiner states (underlining added):

“Thearling does not teach presentation definition identification...Hollander teaches presentation definition identification (Hollander column 4, lines 41-43).”

Please refer to FIG. 1, col. 4, lines 28-37 and col. 6, line 63 to col. 7, line 4 of Hollander (quoted above). The “identifier” in Hollander is not received from a customer system or client. Rather, it is received from a host application 30 running on a host processor 20 (e.g., a mainframe computer) via an API message 42.

As such, Hollander does not teach or suggest those elements of previous Claim 17 that recite: “means to receive inputs from said customer system and to deliver said presentation to said customer system”; and, “wherein said inputs include a customer identification and a presentation definition identification”.

Second, on page 5 of the Office Action the Examiner states (underlining added):

“Hollander teaches means to generate a presentation to deliver to a customer system; wherein said means to generate includes an analytic decision engine system including model presentation services and scoring services modules (column 4, lines 63-67).”

However, col. 4, lines 63-67 of Hollander (quoted above) does not teach an analytic decision engine system including a scoring services module for use in generating a presentation. All that col. 4, lines 63-67 of Hollander teaches is a development tool **50** for generating graphic-based and character-based presentation definitions for storing in databases **28**.

As such, Hollander does not teach or suggest those elements of previous Claim 17 that recite: “means to generate a presentation to deliver to a customer system; wherein said means to generate includes an analytic decision engine system including model presentation services and scoring services modules”.

Third, on page 5 of the Office Action the Examiner states (underlining added):

“Hollander teaches wherein said means to generate selects a presentation definition using said presentation definition identification and selects a customer attribute using said customer identification; wherein said presentation definition includes a reference to a data mining model (column 4, lines 41-43; column 4, lines 63-65).

However, col. 4, lines 41-43 and col. 4, lines 63-67 of Hollander (quoted above) do not teach a presentation definition including a reference to a data mining model. In particular, the terms “data mining” or “data mining model” are not mentioned in Hollander at all.

As such, Hollander does not teach or suggest that element of previous Claim 17 that recites: “wherein said presentation definition includes a reference to a data mining model...”.

Fourth, Wilkinson does not teach receiving a presentation definition identification as an input from a customer system as recited in previous Claim 17. On page 3 of the Office Action the Examiner states (underlining added):

“Thearling does not teach wherein said inputs include a customer identification and a presentation definition identification... Wilkinson et al. teaches wherein said inputs include a customer identification (Wilkinson et al., paragraph 0032, second column, lines 6-8; paragraph 0037, second column, lines 10-11).”

The Examiner does not cite where Wilkinson teaches that the presentation definition identification is received as an input from a customer system. Paragraphs 0032 and 0037 of Wilkinson (quoted above) simply do not teach this.

In addition, paragraphs 0032 and 0037 of Wilkinson do not teach a presentation definition identification at all. All that paragraphs 0032 and 0037 of Wilkinson teach are “information presentation instructions”. Information presentation instructions are not the same as a presentation definition identification. According to paragraph 0032 of Wilkinson, information presentation instructions “provide instructions to a ‘touch point’ (e.g., website, call center, email, phone system, a graphical user interface, etc.) for presenting information in accordance with an interaction motivation plan”. In contrast, a presentation definition identification as recited in previous Claim 17 is used to identify a presentation definition.

As such, Wilkinson does not teach or suggest those elements of previous Claim 17 that recite: “means to receive inputs from said customer system and to deliver said presentation to said customer system”; and, “wherein said inputs include a customer identification and a presentation definition identification”.

Fifth, on pages 3-4 of the Office Action the Examiner states (underlining added):

“Wilkinson et al. teaches wherein said means to generate applies said data mining model to said customer attribute to produce an outcome for display in said presentation according to a format included in said presentation definition (Wilkinson et al., paragraph 0036, lines 24-29; paragraph 0039, lines 5-8; paragraph 0045, lines 10-11).”

However, paragraphs 0036, 0039, and 0045 of Wilkinson (quoted above) do not teach applying a data mining model to a customer attribute to produce an outcome for display in a presentation according to a format included in a presentation definition as recited in previous Claim 17. Rather, paragraph 0039 of Wilkinson, for example, teaches an “interaction motivation plan” or model having instructions for developing an “information presentation”. That is, in Wilkinson, the presentation is directly generated by a model. In contrast, in previous Claim 17, a data mining model (which is referenced by a presentation definition) and one or more rules are used to generate an outcome that is then displayed in a presentation according to a format included in a presentation definition. The presentation definition is not generated by the model (as is the case in Wilkinson). Rather, the presentation definition is selected by the presentation definition identification. In addition, the presentation definition of previous Claim 17 includes a reference to a data mining model and one or more rules.

As such, Wilkinson does not teach or suggest that element of previous Claim 17 that recites: “wherein said means to generate applies said data mining model and said one or more rules to said customer attribute to produce an outcome for display in said presentation according to a format included in said presentation definition”.

Sixth, on page 4 of the Office Action the Examiner states (underlining added):

“Thearling does not teach one or more rules...Wilkinson et al. teaches one or more rules
(Wilkinson et al. paragraph 0009, lines 19-20).”

However, paragraph 0009 of Wilkinson (quoted above) does not specify that the rules are included in a presentation definition or are applied along with a data mining model to a customer attribute as recited in previous Claim 17.

As such, Wilkinson does not teach or suggest those elements of previous Claim 17 that recites: “wherein said presentation definition includes a reference to a data mining model and one or more rules”; and, “wherein said means to generate applies said data mining model and said one or more rules to said customer attribute to produce an outcome for display in said presentation according to a format included in said presentation definition”.

For the above reasons, the combination of Thearling, Wilkinson, and Hollander suggested by the Examiner does not teach or suggest every element of the subject matter of previous Claim 17. In particular, Thearling, Wilkinson, and Hollander do not teach or suggest those elements of previous Claim 17 that recite: “means to receive inputs from said customer system and to deliver said presentation to said customer system”; “wherein said inputs include a customer identification and a presentation definition identification”; “means to generate a presentation to deliver to a customer system”; “wherein said means to generate includes an analytic decision engine system including model presentation services and scoring services modules”; “wherein said presentation definition includes a reference to a data mining model and one or more rules”; and, “wherein said means to generate applies said data mining model and said one or more rules to said customer attribute to produce an outcome for display in said presentation according to a format included in said presentation definition”.

In addition, the Applicant believes that Claims 18-23, 25-28, 30-34, and 36, being dependent on previous Claim 17, and adding patentable features thereto, are also patentable.

For reasons similar to those given above with respect to previous Claim 17, the Applicant believes that previous Claim 37 is patentable. In addition, the Applicant believes that Claims 38-48, being dependent on Claim 37, and adding patentable features thereto, are also patentable.

No new matter has been entered by the above amendments (if any).

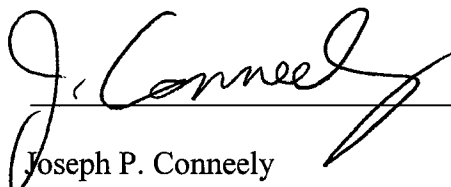
The Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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